

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

**CARLOS A. GARCIA-PEREZ,**  
**et al.,**

Plaintiffs,

v.

**ALVARO SANTAELLA, MD, et al.,**

Defendants.

Civil No. 97-1703 (JAG)

**MOTION REQUESTING EXTENSION OF TIME TO FILE  
AMENDED COMPLAINT AND ANNOUNCE ADDITIONAL EXPERT WITNESSES**

TO THE HONORABLE COURT:

COME NOW the plaintiffs, through the undersigned attorneys, and to this Honorable Court respectfully state and pray:

1. Pursuant to this Honorable Court's Orders, plaintiffs had until September 15, 2004, to amend the complaint and inform additional experts. However, said deadline elapsed during the passing of tropical storm Jeanne.

2. Due to the loss of power and difficulties related to the passing of Jeanne through Puerto Rico, plaintiffs respectfully request a short extension of time until Wednesday, September 22, 2004, to comply with this Honorable Court's Orders, file the Amended Complaint and inform the additional experts.

WHEREFORE, it is respectfully requested from this Honorable Court that it takes notice of the abovementioned and that it grants the herein requested short extension of time until Wednesday, September 22, 2004, to comply with this Honorable Court's Orders, file the Amended Complaint and inform the additional experts.

Respectfully submitted.

In San Juan, Puerto Rico, this 20<sup>th</sup> day of September, 2004.

**I HEREBY CERTIFY:** That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Pedro J. Córdova, Esq., P.O. Box 9023998, San Juan, Puerto Rico 00902-3998; Angel R. de Corral-Juliá, Esq., De Corral & De Mier, 130 Eleonor Roosevelt, San Juan, Puerto Rico 00918-3105; Marta E. Vilá-Báez, Esq., Sánchez, Betances & Sifre, P.O. Box 195055, San Juan, Puerto Rico 00919-5055; Roberto Ruiz-Comas, Esq., González Pando Plaza, 1181 Jesús T. Piñeiro Avenue, San Juan, Puerto Rico 00920-5604; José Enrique Otero, Esq., P.O. Box 9023933, San Juan, Puerto Rico 00902-3933; José Héctor Vivas, Esq., Vivas & Vivas, P.O. Box 330951, Ponce, Puerto Rico 00733-0951; Igor J. Domínguez, Esq., 652 Muñoz Rivera Avenue, Suite 3125, Hato Rey, Puerto Rico 00918-4261; Doris Quiñones-Tridas, Esq., 113 Padre Las Casas, Suite 601, Urb. El Vedado, San Juan, Puerto Rico 00918-3116; Pedro Toledo-González, Esq., Julio Bogoricin Building, Office L-06, Lobby, 1606 Ponce de León Avenue, Santurce, Puerto Rico 00909.

s/ Joan S. Peters

**Joan S. Peters**

USDC-PR 207409

e-mail: [nrodriguez@guillemardlaw.com](mailto:nrodriguez@guillemardlaw.com)

s/ Andrés Guillemard-Noble

**Andrés Guillemard-Noble**

USDC-PR 207308

e-mail: [aguillemard@guillemardlaw.com](mailto:aguillemard@guillemardlaw.com)

**NACHMAN & GUILLEMARD**

Attorneys for Plaintiffs

P.O. Box 9949

San Juan, Puerto Rico 00908

Tel. (787) 724-1212; Fax (787) 725-1339

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